

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

Honorable T.S. Ellis, III

Trial: October 19, 2021

HEARING REQUESTED

**RENEWED MOTION TO SUPPRESS BASED ON LACK OF PROBABLE
CAUSE AND FALSE AND MISLEADING STATEMENTS AND FOR A FRANKS
HEARING**

Zackary Ellis Sanders, by and through undersigned counsel, and pursuant to Federal Rule of Criminal Procedure 41 and the Fourth Amendment, respectfully renews his motion to suppress all evidence obtained pursuant to the invalid search warrant issued in this case because it was not supported by probable cause and was based on an affidavit containing numerous false and misleading statements.¹ The instant motion renews Mr. Sanders's earlier motions to suppress evidence on the bases articulated in his original motions as well as additional grounds that have emerged from newly discovered evidence. This motion is supported by a memorandum in support.

¹ This motion renews and supplements Mr. Sanders's Motion to Suppress Due to Lack of Probable Cause (Motion to Suppress No. 1) (Dkt. 81-82), Motion to Suppress Based on False and Misleading Material Information in Affidavit Paragraph 23 (Motion to Suppress No. 2) (Dkt. 85-86), and Motion to Suppress Based on Materially Misleading Statements and Omissions Regarding Tor, the Target Website, and the Subject Premises (Motion to Suppress No. 3) (Dkt. 83-84). Mr. Sanders also incorporates by reference the following prior pleadings and related exhibits: Dkt. 93, 109, 112, 137, 140, 176, 241, 335, and 426.

Respectfully submitted,

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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress